



Richard Salkie/R2/USEPA/US

12/29/2005 03:26 PM

To Joe Rotola/R2/USEPA/US@EPA

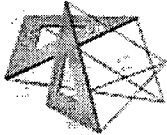
cc Thomas Budroe/R2/USEPA/US@EPA

bcc

Subject Fw: Application of TSCA to Bayonne Barrel

another BB&D note

— Forwarded by Richard Salkie/R2/USEPA/US on 12/29/2005 03:26 PM —



Sarah

Flanagan/R2/USEPA/US

10/11/2005 03:02 PM

To Richard Salkie/R2/USEPA/US@EPA

cc

Subject Application of TSCA to Bayonne Barrel

— Forwarded by Sarah Flanagan/R2/USEPA/US on 10/11/2005 03:02 PM —



Daniel Kraft/R2/USEPA/US

05/26/2004 05:08 PM

To Sarah Flanagan/R2/USEPA/US@EPA

cc John Witkowski/R2/USEPA/US@EPA, Joseph
Cosentino/R2/USEPA/US@EPA, Vivian
Chin/R2/USEPA/US@EPA, Dennis
McChesney/R2/USEPA/US@EPA

Subject Re: Application of TSCA to Bayonne Barrel

Hi Sara. First, the low occupancy /high occupancy issue in 761.61 (a) does not carry over to 761.61 (c). We have flexibility in approving the future uses of the site. You're rightit would depend on the risk evaluation and the RA's determination on what would not constitute an unreasonable risk.

Sarah Flanagan



Sarah Flanagan

05/25/04 06:29 PM

To: Daniel Kraft/R2/USEPA/US@EPA

cc: Joseph Cosentino/R2/USEPA/US@EPA, John
Witkowski/R2/USEPA/US@EPA

Subject: Application of TSCA to Bayonne Barrel

Dan,

A question came up today about the allowable future uses of the Bayonne Barrel & Drum Site, assuming that PCB contaminated soil remains on-site. Joe and I differed somewhat in our recollection of the answer, so we wanted to pose it to you.

We all agree that the PRPs are going to be implementing a risk based closure at the Site under 40 CFR 761.61(c). Once they do so, which I guess means completing a risk assessment to show that the solidification and capping cleanup they are proposing would not result in any unacceptable risk, do they also have to restrict certain areas of the site as "low occupancy areas" following the criteria of 761.61(a). If not, how do we determine which future uses are acceptable, and which are not? For example, today the prospective developers said they were thinking of retail at the Site. The store would be built over an area with PCBs up to, say, 50 ppm PCBs. Is that problematic? Or does that depend on the results of the PRPs' risk assessment?

Thanks Dan. We appreciate your assistance. Joe, if you think I haven't posed the question the way you would have, please weigh in.

Sarah

Richard Salkie/R2/USEPA/US

To Joe Rotola/R2/USEPA/US@EPA

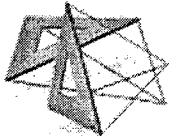
cc Thomas Budroe/R2/USEPA/US@EPA

12/29/2005 03:05 PM

bcc

Subject Fw: Bayonne Barrel Documents

BB&D reports are attached per your request. The second attachment is a letter to the PRP group following up on the Sept 12 meeting requesting, in writing, the stuff that we asked for at the meeting - including the RASR and risk assessment. We asked the at the 9/12/05 meeting to send us the draft documents that they had already developed. Apparently they didn't as we received them last Friday, Dec 23, 2005. Also attached is Sarah's summary of the 9/12/05 meeting, which is the most informative document of all the attachments - it is a good summary of the issues and what is needed to finish — Forwarded by Richard Salkie/R2/USEPA/US on 12/29/2005 02:48 PM —



Sarah
Flanagan/R2/USEPA/US

12/29/2005 02:19 PM

To Richard Salkie/R2/USEPA/US@EPA

cc

Subject Bayonne Barrel Documents

Dick,

As discussed, attached are the RASR (which includes a risk assessment as appendix A), and the letter that EPA sent to the PRP Group in October asking for the RASR, the risk assessment, and the comparative evaluation.



Bayonne Barrel and Drum Site RASR-12-22-05.pdf 1021 hyatt cleanup.wpd

Finally, I am also sending you a memo that I wrote to the file after the September meeting, in case it is of some use.



0922 meeting summary.wpd

Sarah P. Flanagan
Office of Regional Counsel, NJ Superfund Branch
USEPA, Region II
290 Broadway, 17th Floor
New York, NY 10007
Tel: 212-637-3136
Fax: 212-637-3096

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